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August 10, 2022

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Court Judge  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Abraham Adeniyi  
1:21-cr-00159 (ER)

Dear Judge Ramos,

Michael Cornacchia and I represent Abraham Adeniyi in the above captioned case. We write to respectfully request an adjournment of the August 12, 2022 status conference. There were two prior adjournment requests filed since the undersigned were retained to represent Mr. Adeniyi. The reasons for the prior requests were to allow the parties to engage in good faith negotiations in attempt to reach a disposition in this case. The parties have reached a preliminary agreement and are finalizing the details of the resolution. Further, once the defense is provided with a written plea agreement, we will need time to review this agreement with Mr. Adeniyi. We therefore request an adjournment of the August 12, 2022 status conference to the week of September 19, 2022. The government (by AUSA Anden Chow) consents to this request. Mr. Adeniyi consents to the exclusion of time and waives speedy trial rights under 18 U.S. Code § 3161 from August 12, 2022 through September 23, 2022. We apologize for submitting this request later than 48 hours before the August 12, 2022 appearance as required by Your Honor's rules and we thank Your Honor for his time and consideration.

Respectfully submitted,

/s

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Carla Sanderson  
Michael Cornacchia